



COUNTY OF YOLO

Office of the County Administrator

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Jeremy Arrich
Chief, Central Valley Flood Planning Office
California Department of Water Resources
1416 9th Street
Sacramento, CA 95814

RE: Comments on the 2012 Central Valley Flood Protection Plan Working Draft

Dear Mr. Arrich:

Yolo County appreciates the opportunity to provide comments on the 2012 Central Valley Flood Protection Plan (CVFPP) Working Draft. As suggested during the recent working group meetings, these comments are focused on the issues of critical importance to the County. However, we fully anticipate providing more detailed comments on the public review Draft CVFPP upon its release. The following are the County's initial concerns regarding the CVFPP Working Draft:

Expanding the Yolo and Sacramento Bypasses Will Adversely Affect the County

The eastern boundary of the County is formed by the alignment of the Sacramento River and the Yolo Bypass extends for approximately 30 miles through the County from the Fremont Weir to Liberty Island. By providing flood protection for the densely populated Sacramento urban area, the Yolo Bypass provides one of the most important flood control functions of the State flood control system. However, the frequent flooding that occurs within the Bypass directly affects agriculture and other existing land uses, including waterfowl habitat (e.g. the Vic Fazio Yolo Bypass Wildlife Area) and habitat for other terrestrial species. The County therefore has a direct interest in the Bypass's flood control operations. Any potential changes to bypass operations that could affect existing land uses within the Bypass are of particular concern to the County.

The CVFPP Working Draft contemplates expanding the Yolo Bypass to increase the overall capacity of the flood system to convey large flood events. This expansion includes lengthening and/or lowering the Fremont Weir, incorporating features into the weir to facilitate fish passage, setting back levees and/or purchasing easements to the east of the bypass from Fremont Weir to Putah Creek, setting back levees and/or purchasing easements on the west side of the Bypass upstream from Rio Vista, widening and automating the Sacramento Weir and Bypass, and constructing approximately 42 miles of new levees along the Yolo Bypass and 2 miles of new levees along the Sacramento Bypass.

The implementation of these bypass expansion components would likely represent the largest infrastructure project in the County's history. The scale of the potential environmental impacts associated with these changes is unprecedented in the County. The County's agricultural economy would be directly affected through the loss of highly productive agricultural land in order to accommodate new levee setbacks and flood inundation areas. In addition, the CVFPP Working Draft contemplates the removal of approximately 10,000 acres of agricultural land within bypasses to accommodate environmental restoration efforts. The amount of land within the Yolo Bypass intended to be set aside for restoration efforts is unclear, although it would surely be substantial.

The County has consistently implemented policies that focus urban development within cities while preserving agricultural land and discouraging development within the County's unincorporated area. These policies have allowed urban communities outside of the County to substantially benefit from the significant flood protection facilities within the County. However, the County is financially incapable of continuing to accommodate the

flood control burdens necessary to allow continued urban growth in other communities. Therefore, the County reasonably expects that any infrastructure modifications within the Yolo and/or Sacramento Bypasses will, at a minimum, incorporate clear benefits to the recreational, agricultural, natural resource and economic base of the County. Without such benefits, the County's economic base will continue to deteriorate and the County will be unable to provide even basic services to its constituents.

Coordination Needed Between CVFPP Working Draft and BDCP

The County has been working with the California Natural Resources Agency to evaluate and refine a conservation measure proposed as part of the Bay Delta Conservation Plan (BDCP) that would increase the duration of flooding within the Yolo Bypass in an effort to enhance salmonid and splittail rearing habitat. Identified as Conservation Measure #2, this proposed change in operations has the potential to directly affect the flood control functions of the Yolo Bypass by increasing the volume of flood water resident within the Bypass during winter and spring storm events, thus reducing its effective capacity to carry peak flood flows. Although the BDCP planning efforts are mentioned in the CVFPP Working Draft, the County is concerned that the CVFPP Working Draft is being prepared independent of Conservation Measure #2 and the BDCP process. In addition, Yolo County was just informed on November 17, 2011 that the California Department of Water Resources is separately pursuing modifications to the Yolo Bypass in response to the schedule constraints identified in the OCAP Biological Opinion. As a result, three separate large-scale efforts to modify the flooding control operations of the Yolo Bypass are currently being pursued with the County directly involved in only one of these efforts.

Funding Necessary for County Planning and Public Outreach Activities

In order for these efforts to be successful, Yolo County needs to be directly involved in the planning and decision making processes and should be considered a partner at the table. However, as an agriculturally-dominated county with limited staff resources, the County simply does not have the capacity or flood control expertise to track and participate in three major infrastructure planning efforts for the Yolo Bypass. One of the primary reasons that the Conservation Measure #2 planning efforts have been successful to date has been the availability of outside funding that has allowed the County to offset a small portion of staff costs and hire outside experts (e.g., Dr. Richard Howitt with U.C. Davis) to focus specifically on studying the environmental and economic effects of Conservation Measure #2. If the future flood control modifications identified in the CVFPP Working Draft are to be seriously considered by the County, the provision of a supplemental County funding source is imperative. Therefore, the County respectfully requests that the Draft CVFPP include a funding mechanism to allow the County to participate in the planning and public outreach activities that will be necessary to evaluate and refine the flood control concepts included in the CVFPP Working Draft.

Base Flooding Elevations Information Needed for Clarksburg

The community of Clarksburg has a heightened risk of flooding due to its elevation and location adjacent to the Sacramento River. This heightened flood risk has required the payment of high flood insurance premiums by residents and business owners. Due to the implementation of stricter federal regulations, these insurance premiums are anticipated to substantially increase in the future, which will result in a significant burden on Clarksburg residents and businesses.

In order to better understand the flood protection options and strategies for Clarksburg, basic analysis of the flooding potential within Clarksburg needs to be conducted including determining the estimated base flood elevations within the community. However, no funding is currently available to determine these elevations. Yolo County strongly recommends that either this work be included as a key component of the CVFPP Draft or that adequate funding be provided to the County to conduct this work independently.

Flood Protection for Small Communities is Undefined

The CVFPP Working Draft identifies a flood management element that would provide 100-year level of protection to small communities protected by the SPFC but does not identify how specific communities would be protected or the flood protection infrastructure that would be necessary for these communities. Yolo County is particularly concerned with flooding within the Knights Landing and Clarksburg communities. The Draft CVFPP should more specifically identify the flood control measures that are intended to be implemented within these small communities to ensure 100-year protection. Also, the Draft CVFPP should be revised to

include strong assurances regarding community involvement in the design and implementation of such projects.

Identified Yolo Bypass Improvements Unclear

Figure 3-1 on page 3-5 of the CVFPP Working Draft identifies a number of improvements within Yolo County but little information is provided regarding the specific details of these improvements. As examples, a bridge improvement is identified on U.S. Interstate 80 within the Yolo Bypass, a fish passage improvement is identified above Knights Landing, and a fish passage improvement is identified in the southern Yolo Bypass. The Draft CVFPP should provide specific details regarding these proposed improvements so that the residents within the County can better understand the potential effects these improvements could have on local communities.

Consistency with the Yolo Natural Heritage Program Required

The County has expended significant dollars and years of effort planning and developing the Yolo Natural Heritage Program. The CVFPP Working Draft identifies a substantial amount of habitat restoration anticipated to occur within the Yolo Bypass. Any restoration activities anticipated with implementation of the CVFPP Working Draft need to ensure that they do not conflict with the habitat and species restoration goals and objectives of the Natural Heritage Program. The same is true for other elements of the Draft CVFPP, including the proposed expansion of the Yolo Bypass and similar projects.

Coordination Necessary Regarding Enhanced Flood Emergency Response Efforts

The County appreciates the inclusion of flood emergency response components in the CVFPP Working Draft. However, close coordination with the County will be necessary to ensure that proposed emergency response efforts take into consideration the unique rural character of the County and the County's limited existing flood emergency response capabilities.

Again, we appreciate this opportunity to provide comments on the CVFPP Working Draft and look forward to work closely with the Department of Water Resources in refining the CVFPP.

Sincerely,



Patrick Blacklock
Yolo County Administrator